

To: Morgan - CDPHE, Kelly[kelly.morgan@state.co.us]
From: Boeglin, Michael
Sent: Tue 5/16/2017 6:03:20 PM
Subject: RE: QNCR discussion for next Thursday

Yes, looks like a good item. Is it correct that this business process applies to the entire Clean Water Program (e.g. not just the Clean Water Enforcement Unit)?

Mike

From: Morgan - CDPHE, Kelly [mailto:kelly.morgan@state.co.us]
Sent: Tuesday, May 16, 2017 9:10 AM
To: Boeglin, Michael <Boeglin.Michael@epa.gov>
Subject: Re: QNCR discussion for next Thursday

Thanks Michael-

Can we add a discussion about our draft SEV data entry process (Attached)?
Thanks

Kelly

On Fri, May 12, 2017 at 10:44 AM, Boeglin, Michael <Boeglin.Michael@epa.gov> wrote:

Hi Kelly,

In accordance with the new SRF action item regarding timely and appropriate enforcement, we need to discuss the QNCR during the next quarterly meeting here next Thursday. It doesn't expand the subset of facilities subject to review (still just SNC, as specified in the PPA), but we should talk about the status of review/escalation/return to compliance.

There are 15 facilities in SNC on the second quarter QNCR, which we ran last week after the second-to-last RNC prior to it going final (I think I said that right). I have attached that QNCR and list the 15 facilities here with some pointed questions to facilitate our conversation Thursday. No need to prepare/send me anything in writing, although if it helps

the conversation you are certainly welcome to bring something. Whatever is easiest for you. The main point of this new format is to ensure that EPA is asking, and getting answers to, the right questions to ensure that escalation of noncompliance is happening where it really needs to.

Thanks a lot, and let me know if you want to discuss anything before the meeting.

Mike

Cherokee Metro District – I understand that final construction is not set to be complete until 2022. Is that still the case, and should we expect to see the TDS violations continue until then?

Del Norte – BOD hits. Is the 2008 order still open? Given how old that order is, one might not expect that its terms would address new BOD exceedances.

Evans WWTF – Oct. and Jan. BOD hits. Construction of new facilities was to commence August 2016. Is that happening?

Longmont WWTF – Report on completion of required work on facility on-site construction was due Nov. 2016. Status of that report?

Pueblo West Metro District – An earlier QNCR status report from Mike said that the facility is unable to meet its new limit – Selenium, copper, zinc, not sure which parameter because there are no hits in ECHO. But the facility could not achieve the schedule event for final compliance.

Regional WWTF (CO0041840) – New to QNCR with a total arsenic hit in the second quarter.

Rocky Ford WWTF – Were the three missing DMRs from 2015-2016 ever received?

Steamboat Springs WWTF – Has the January DMR for monitoring only at 100-1 been received?

Sterling – Has the Oct 2016 DMR for monitoring only at 300-1 been received? Also, facility was to commence required construction pending Division approval of final design. Has this not happened?

Vista WWTF – Have the Oct-Nov 2016 DMRs for monitoring only at 300-1 been received?

Woodmen Hills Metro District – Explanation for why facility is failing WET And BOD in 2015-2016 despite the 2015 enforcement action? Is there a time lag here in returning to compliance?

Erie North WRF – Mike Harris reported last year that the rolling average keeps coming down, but the facility is still exceeding it. Why does the state not enforce against this limit?

Fort Morgan Western Sugar – What is the status of negotiation of new terms in the consent decree?

London Water Tunnel – What is the status of the purchase/sale of the mine and ensuing treatment upgrades?

Seneca Mine Complex – My interpretation of the last QNCR report from Mike was that the March 2016 sampling at monitoring points 3 and 5 were completed but that there was a miscommunication by new personnel at the facility. Can this violation therefore be resolved manually if the monitoring data was received?

Michael Boeglin

Water Enforcement Program

U.S. EPA Region 8

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